

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GENINE CANNATA, *et al.*,

Plaintiffs,

vs.

WYNDHAM WORLDWIDE
CORPORATION, *et al.*,

Defendants.

Case No. 2:10-cv-00068-PMP-VCF

**JOINT SUBMISSION REGARDING E-
DISCOVERY PRESUMPTIVE
DEADLINES**

WHEREAS, the parties held an initial phone conference on March 5, 2012 with the e-Discovery Special Master about implementation of Order No. 259.

WHEREAS, pursuant to those discussions, the parties and the Special Master agreed to the following *presumptive* deadlines:

1. Plaintiffs to propose initial list of up to 30 search terms, in accordance with the mandates of Order No. 259: March 12, 2012.
2. Parties to meet and confer on both parties' data sources: March 19, 2012.
3. Plaintiffs to provide initial list of "up to 30 e-mail custodian accounts or other defined data storage sites," in accordance with the mandates of Order No. 259: sufficiently in advance of the March 26 deadline in no. 4 below, so the Wyndham Defendants can harvest data for identified custodians, load same into Relativity, and produce hit reports by the March 26 deadline in no. 4 below.
4. *Presumptive* deadline (meaning Defendants can ask for more time if needed to harvest additional data, load same into Relativity, and produce hit reports) for Defendants to produce hit reports for initial search terms (up to 30) and e-mail custodian accounts or other defined data storage sites (up to 30): March 26, 2012.
5. Parties to meet and confer and select final search terms and e-mail custodian accounts or other defined data storage sites: April 2, 2012.
6. *Presumptive* deadline (meaning Defendants can ask for more time if volume of data exceeds reasonable ability to run hit reports, review resultant data for responsiveness and privilege, and prepare production load file) for Defendants to produce non-privileged, responsive data to Plaintiffs: April 16, 2012.

WHEREAS, the parties also agree that all production of ESI will take place via a Concordance dat load file with Group IV tiff images and associated searchable text and that pursuant to Order No. 259:

- all email correspondence produced shall include all metadata; and
- all other ESI shall include only metadata fields showing the date and time the document was created and revised, as well as where it was stored.

WHEREAS, if a dispute develops regarding any of the above activities, either party may contact the Special Master by e-mail to request a phone conference.

WHEREAS, the e-Discovery Special Master will hold status calls on the following dates and times:

1. Date: Apr 5, 2012 Time: 2 PM EST / 11 AM PST

2. Date: Apr. 24, 2012 Time: 2 PM EST / 11 AM PST

Dated: March 7, 2012

Dated: March 7, 2012

/s/ Felicia Medina

FELICIA MEDINA, ESQ.
Sanford Wittels & Heisler, LLP

EDWARD CHAPIN, ESQ.
JILL SULLIVAN, ESQ.
Chapin Fitzgerald Sullivan, LLP

VINCENT AIELLO, ESQ.
The Aiello Law Firm

Attorneys for Plaintiffs

Dated: March 7, 2012

/s/ Patrick N. Chapin

PATRICK N. CHAPIN, ESQ.
Patrick N. Chapin, Ltd.

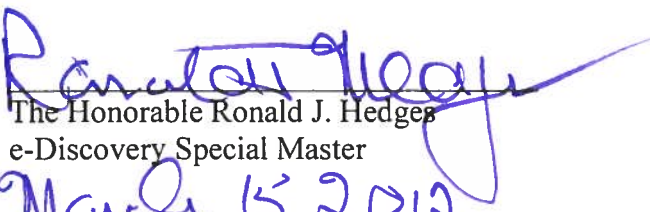
Attorney for Defendant James Friedman

SO ORDERED:

/s/ Patrick Hicks

PATRICK H. HICKS, ESQ.
PAUL WEINER, ESQ.
WENDY MEDURA KRINCEK, ESQ.
KRISTINA ESCAMILLA, ESQ.
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Attorneys for the Wyndham Defendants


The Honorable Ronald J. Hedges
e-Discovery Special Master
March 15, 2012